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June 15, 2005

Mr. Charles Terreni
Chief Clerk of the Commission
SC Public Service Commission
P. O. Drawer 11649
Columbia, SC 29211

RE: Annual Review of Base Rates for Fuel Costs for Duke Power
Docket No. 2005-3-E

Dear Mr. Terreni:


Enclosed please find for filing an original and one (1) copy of the South Carolina Energy Users Committee's First set of Data Request together with a Certificate of Service in the above-captioned matter.

I have enclosed an extra copy of these Data Request which I would ask you to date stamp and return to me in the self-addressed, stamped envelope provided for your convenience. By copy of this letter, I am serving all parties of record.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Sincerely Yours,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/jcl
Enclosures

cc: All parties of record (w/enc.)

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2005-3-E

IN THE MATTER OF:)	
)	
Duke Power Annual Review of Base)	SCEUC'S FIRST SET OF
Rates for Fuel Costs)	DATA REQUESTS
)	TO DUKE POWER

SOUTH CAROLINA
PUBLIC SERVICE COMMISSION
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TO: DUKE POWER AND ITS ATTORNEY, LARA SIMMONS NICHOLS, ESQUIRE

In accordance with S.C. Code Ann. Regs. R.103-851, and R.103-854, Intervenor, the South Carolina Energy Users Committee ("SCEUC") requests the Applicant, Duke Power ("Duke") answer the following data request and requests that the information and documents requested below be provided within ten (10) days from the date of service, under oath, through the individual officers, managing agents, employees, members or representatives who are most knowledgeable with respect to the subject to which each respective interrogatory is addressed:

INSTRUCTIONS

The Intervenor requests Duke to serve its responses upon the Intervenor's undersigned counsel not later than ten (10) days after the service hereof. The data requests are to be deemed to be of a continuing nature so as to require supplementation and amendment promptly, as necessary, in order to comport with facts and information that is known or available to you at the time of the initial responses of these interrogatories. With respect to the production of documents, the requested documents should be provided to the Intervenor by delivery to the undersigned at 721 Olive Street, Columbia, South Carolina 29205, or at such other locations as is

mutually agreeable to Duke and the Intervenor. The documents will be promptly returned after reproduction (if required).

If Duke claims a privilege as to any interrogatory or request for production, with respect thereto, set forth the following:

1. Who possess any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

A. As used herein, the term "Document" is used in the broadest sense and includes, but is not limited to, any written, printed, recorded, typed or graphic matter, however produced or reproduced, including all non-identical copies thereof and further including, but not limited to, any books, ledgers, pamphlets, periodicals, brochures, letters, memoranda, advertisements, proposals, telegrams, telexes, reports, telephone logs, drafts, business records, handwritten notes, bill, checks, invoices, charts, graphs, indices, tapes, transcripts, data sheets, records of telephone calls, data processing cards, and electronically-stored data such as documents stored on network drives, hard drive, cd-rom optical disks, magnetic tape, 3.5 in and 5.25 inch floppy disks, electronic mail files, both current and deleted, and any other computer files of whatever type which are in Duke's possession, custody or control.

B. As used herein, the words “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and this request any documents which might otherwise be construed to be outside its scope.

C. Wherever applicable, the singular form of a word should be interpreted as plural.

D. As used herein, the word “you” or “your” means or refers to Duke, its agents, consultants, or any member, officer or other representative of Duke.

E. As used herein, the word “identify” means provision of dates, times, places, parties to any oral communication. With respect to any other communication, it means the date, length and medium of communication or document. With respect to any person(s), it means name, title, address and telephone number.

QUESTIONS

SCEUC 1-1. Please provide all forecasted costs of natural gas, fuel oil, coal and nuclear costs for the requested fuel factor. Please provide all bases for these forecasts.

SCEUC 1-2. Please provide all costs incurred in the test year for natural gas, fuel oil, coal and nuclear costs.

SCEUC 1-3. Please provide all workpapers used to calculate the experience modification factor and forecasted fuel rate.

SCEUC 1-4. Please provide a breakdown of this cost increase, both in dollar and percentage terms, for the typical residential, commercial and industrial consumer.

SCEUC 1-5. Please provide monthly generation output figures for all generation plants owned or operated by Duke for service to South Carolina consumers.

SCEUC 1-6. Please provide a detailed summary of all purchased power costs incurred by Duke in the test year. Please be as specific as possible and provide the purchased power costs in terms of capacity costs, fuel costs, transmission costs, etc.

SCEUC 1-7. Please provide copies of the monthly fuel recovery reports currently filed with the PSC and/or with the ORS since June 1, 2004.

SCEUC 1-8. Please provide a quarterly forecast of the expected fuel factor to be set at Duke's next annual fuel proceeding based upon Duke's historical over/under recovery to date and Duke's forecast of prices for natural gas, coal, oil and other fuel required for generation of electricity.

Elliott & Elliott, P.A.



Scott Elliott
721 Olive Street
Columbia, SC 29205
803-771-0555 Phone
803-771-8010 Fax

ATTORNEY FOR SOUTH CAROLINA
ENERGY USERS COMMITTEE

Columbia, South Carolina

June 15, 2005

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Annual Review of Base Rates for Fuel Costs for Duke Power

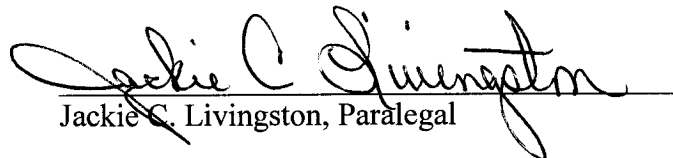
DOCKET NO.: 2005-3-E

PARTIES SERVED: Florence P. Belser, Esquire
ORS
1441 Main Street, Ste. 300
Columbia, SC 29201

Lara Simmons Nichols
Duke Power
Law Department, PB05E
P. O. Box 1244
Charlotte, NC 28201

PLEADING: FIRST SET OF DATA REQUEST TO DUKE POWER

June 15, 2005


Jackie C. Livingston, Paralegal